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July 3, 2002

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OFFICE OF THE EXECUTIVE SECRETARY

Tennessee Regulatory Authority Mr. David Waddell, Executive Secretary 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Re: 1-800-RECONEX, Inc. (Docket No. 02-00711)

Dear Mr. Waddell:

Pursuant to your correspondence dated June 27, 2002, please accept this correspondence as a response to your questions.

## **Financial Information:**

 Please provide the Applicant's source of funding its Tennessee network, equipment, UNEs such as the following: cash, loan commitments, vendor credits, letters of credit, etc.

1-800-RECONEX, Inc. ("Reconex") will not have any networks, facilities, or equipment in the state of Tennessee. Reconex is simply seeking facilities-based authority in order to provision service via the unbundled network element platform (UNE-P). Provisioning service via UNE-P does not require Reconex to construct, install, or maintain its own facilities, plant, or equipment. Thus, no additional capital expenditures will be required. The method in which Reconex will utilize UNE-P will not require any additional financial, managerial, or technical expertise (in fact the method utilized by Reconex is in reality, functionally equivalent to resale but simply provides a greater margin)

## **Miscellaneous Information:**

- Please provide the following information to the Numbering Issue questions for your proposed service area:
- 1. What is your company's expected demand for NXX per NPA within a year of approval of your application?

Reconex estimates an expected demand for 100 NXX total between all NPAs within a year of approval of our application.

2. How many NXXs do you estimate that you will request for NANPA when you establish your service footprint?

None. Reconex does not request or order NXX's. Reconex obtains its end-user telephone numbers from the Incumbent Local Exchange Carrier ("ILEC").

3. When and in what NPA do you expect to establish your service footprint? Unknown.

4. Will the company sequentially assign telephone numbers within NXXs?

Reconex does not assign NXX's. The ILEC assigns the NXX's to Reconex.

5. What measures does the company intend to take to conserve Tennessee Numbering resources?

Reconex does not reserve numbers. Reconex simply provisions/provides service to customers through the services of the ILEC.

6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

Reconex does not order NXX's. Reconex obtains end-user telephone numbers from the ILEC.

- Please provide the following information to the Tennessee Operational Issue questions for your proposed service area:
- 1. How does the company intend to comply with TCA§65-21-114? In its description please explain technically how the company will not bill for countywide calls within Tennessee.

Reconex provides a flat-rate service for the customer's LATA, therefore calls made between two points in the same county in Tennessee will be classified as toll-free and not be billed to the customer.

2. Is the Company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone number s on the database?

No, however, the ILEC will have this responsibility. Reconex will simply be provisioning service utilizing UNE-P.

3. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service area?

Yes,

4. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro calling areas.

Reconex's intent is to provide a flat-rate service for the customer's LATA. Only intraLATA and interLATA calls would be subject to long distance.

5. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 et seq. and Chapter 1220-4-11?

Reconex does not intend on telemarketing its services in the state of Tennessee. However, Reconex should decide, in the future, to telemarket its services, Reconex will become aware and comply with the telemarketing statutes and regulations found in TCA §65-4-401 et seq. and Chapter 1220-4-11?

If you have any questions or need any further information, I can be reached at 503-982-5572 or <a href="mailto:anne.lynch@reconex.com">anne.lynch@reconex.com</a>.

Sincerely,

Anne Lynch

Regulatory Manager

cc: Darrell Whitis